

<p><b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b></p>	
<p><b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b></p> <p><b>GENOVA BURNS LLC</b>          Angelo J. Genova, Esq.          Daniel M. Stolz, Esq.          Donald W. Clarke, Esq.          Matthew I.W. Baker, Esq.  <a href="mailto:agenova@genovaburns.com">agenova@genovaburns.com</a>  <a href="mailto:dstolz@genovaburns.com">dstolz@genovaburns.com</a>  <a href="mailto:dclarke@genovaburns.com">dclarke@genovaburns.com</a>  <a href="mailto:mbaker@genovaburns.com">mbaker@genovaburns.com</a>          110 Allen Road, Suite 304          Basking Ridge, NJ 07920          Tel: (973) 467-2700          Fax: (973) 467-8126  <i>Local Counsel to the Official Committee of Talc Claimants</i></p>	<p><b>BROWN RUDNICK LLP</b>          David J. Molton, Esq.          Robert J. Stark, Esq.          Michael Winograd, Esq.          Jeffrey L. Jonas, Esq.  <a href="mailto:dmolton@brownrudnick.com">dmolton@brownrudnick.com</a>  <a href="mailto:rstark@brownrudnick.com">rstark@brownrudnick.com</a>  <a href="mailto:mwinograd@brownrudnick.com">mwinograd@brownrudnick.com</a>  <a href="mailto:jjonas@brownrudnick.com">jjonas@brownrudnick.com</a>          Seven Times Square          New York, NY 10036          Tel: (212) 209-4800          Fax: (212) 209-4801</p> <p>and</p> <p>Sunni P. Beville, Esq.  <a href="mailto:sbeville@brownrudnick.com">sbeville@brownrudnick.com</a>          One Financial Center          Boston, MA 02111          Tel: (617) 856-8200          Fax: (617) 856-8201  <i>Co-Counsel for the Official Committee of Talc Claimants</i></p>
<p><b>BAILEY GLASSER LLP</b>          Brian A. Glasser, Esq.          Thomas B. Bennett, Esq.  <a href="mailto:bglasser@baileyglasser.com">bglasser@baileyglasser.com</a>  <a href="mailto:tbennett@baileyglasser.com">tbennett@baileyglasser.com</a>          105 Thomas Jefferson St. NW, Suite 540          Washington, DC 20007          Tel: (202) 463-2101          Fax: (202) 463-2103  <i>Co-Counsel for the Official Committee of Talc Claimants</i></p>	<p><b>OTTERBOURG P.C.</b>          Melanie L. Cyganowski, Esq.          Adam C. Silverstein, Esq.          Jennifer S. Feeney, Esq.  <a href="mailto:mcyganowski@otterbourg.com">mcyganowski@otterbourg.com</a>  <a href="mailto:asilverstein@otterbourg.com">asilverstein@otterbourg.com</a>  <a href="mailto:jfeeney@otterbourg.com">jfeeney@otterbourg.com</a>          230 Park Avenue          New York, NY 10169          Tel: (212) 905-3628          Fax: (212) 682-6104  <i>Co-Counsel for the Official Committee of Talc Claimants</i></p>

<p><b>PARKINS LEE &amp; RUBIO LLP</b> Leonard M. Parkins, Esq. Charles M. Rubio, Esq. <a href="mailto:lparkins@parkinslee.com">lparkins@parkinslee.com</a> <a href="mailto:crubio@parkinslee.com">crubio@parkinslee.com</a> Pennzoil Place 700 Milan St., Suite 1300 Houston, TX 77002 Tel: (713) 715-1666 <i>Special Counsel to the Official Committee of Talc Claimants</i></p>	<p><b>MASSEY &amp; GAIL LLP</b> Jonathan S. Massey, Esq. <a href="mailto:jmassey@masseygail.com">jmassey@masseygail.com</a> 100 Main Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467 <i>Special Counsel for the Official Committee of Talc Claimants</i></p>
<p>In re:</p> <p><b>LTL MANAGEMENT, LLC,</b></p> <p style="text-align: right;">Debtor.</p>	<p>Chapter 11</p> <p>Case No.: 21-30589(MBK)</p> <p>Honorable Michael B. Kaplan</p>
<p><b>LTL MANAGEMENT LLC,</b></p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p><b>THOSE PARTIES LISTED ON APPENDIX A TO COMPLAINT and JOHN AND JANE DOES 1-1000,</b></p> <p style="text-align: right;">Defendants.</p>	<p>Adv. Pro. No. 21-03032 (MBK)</p>

**DECLARATION OF MELANIE L. CYGANOWSKI IN SUPPORT OF  
OBJECTION OF THE OFFICIAL COMMITTEE OF TALC CLAIMANTS TO  
DEBTOR'S MOTION FOR AN ORDER (I) DECLARING THAT THE AUTOMATIC  
STAY APPLIES TO CERTAIN ACTIONS AGAINST NON-DEBTORS OR (II)  
PRELIMINARILY ENJOINING SUCH ACTIONS AND (III) GRANTING A  
TEMPORARY RESTRAINING ORDER PENDING A FINAL HEARING**

I, Melanie L. Cyganowski, pursuant to 28 U.S.C. § 1746, declare, under penalty of perjury, that the following is true and correct:

1. I am a Member of the firm of Otterbourg P.C., co-counsel to the Official Committee of Talc Claimants (the “Official Committee”).

2. I submit this declaration to place in the record on the *Debtor’s Motion for an order (I) Declaring that the Automatic Stay Applied to Certain Actions Against Non-Debtors or (II) Preliminarily Enjoining Such Actions and (III) Granting a Temporary Restraining Order Pending a Final Hearing* [Adv. Pro. Dkt. No. 2] certain documents that have not been previously submitted in connection with the Motion.

3. Attached hereto true as Exhibit A is a true and correct copy of the transcript of the deposition of John K. Kim taken on October 31, 2021 in this Adversary Proceeding, with pages 245:11 to 248:5, redacted pursuant to the parties’ confidentiality agreement, and including the errata sheet signed by Mr. Kim.

4. Attached hereto as Exhibit B is a true and correct copy of a document bearing Bates numbers JNJ 00088189\_0001-0005, represented to me to have been produced by Johnson and Johnson in talcum powder litigation.

5. Attached hereto as Exhibit C is a true and correct copy of a document bearing Bates numbers JNJ 000018966-9024, represented to me to have been produced by Johnson and Johnson in talcum powder litigation.

6. Attached hereto as Exhibit D is a true and correct copy of a document bearing Bates numbers JNJ 0000234904-05, represented to me to have been produced by Johnson and Johnson in talcum powder litigation.

7. Attached hereto as Exhibit E is a true and correct copy the transcript of the deposition of Danielle Devine taken on January 19, 2021 in *Pulido v. Johnson and Johnson*.

8. Attached hereto as Exhibit F is a true and correct copy of the transcript of the deposition of Christopher Picariello taken on January 11, 2019 in *McElroy v. Johnson & Johnson*.

9. Attached hereto as Exhibit G is a true and correct copy of (a) a chain of emails from Jay Bhimani, dated November 12 and 16, 2021, attaching Order Granting Debtor's Request for Preliminary Injunctive Relief filed in this Adversary Proceeding [Dkt. No. 102], and (b) a Notice Bankruptcy Filing and Stay of Proceedings, in *Reyes v. Johnson and Johnson*.

10. Attached hereto as Exhibit H is a true and correct copy of the transcript of proceedings held on October 6, 2021 in *Johnson v. Johnson and Johnson*.

11. Attached hereto as Exhibit I is a true and correct copy of the transcript of proceedings held on October 12, 2021 in *Johnson v. Johnson and Johnson*.

12. Attached hereto as Exhibit J is a true and correct copy of the Entry of Judgment dated October 15, 2021 in *Johnson v. Johnson and Johnson*.

13. Attached hereto as Exhibit K is a true and correct copy of a document bearing Bates numbers LTL 0021791 – LTL 0021801, produced by the Debtor in this Adversary Proceeding.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York State on December 22, 2021.

/s/ Melanie L. Cyganowski  
Melanie L. Cyganowski